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Subject: For use on conference call tomorrow

Historical Info on Dupont Dow Elastomers and Chloroprene Air Releases from the Rubbertown Kentucky Facility

In the late 1990's, I began providing technical assistance to the EJ Community (Justice Resource Center, REACT, and Riverside Gardens Community Group) in Rubbertown (Louisville) Kentucky.

Beginning in 1999, air samples were collected from 6 locations in the Rubbertown area (see attached map), once every 12 days for a 24 hour period. The air samples were collected and analyzed for Volatile Organic Compounds by the University of Louisville.

Three fence line sites were designated to measure maximum chemical concentrations.
- Louisville Police Firearms Training Center, Algonquin Parkway
- Ralph Avenue/Camp Ground Road
- Chickasaw Park, Algonquin Parkway

Two Neighborhood sites to measure typical concentrations in West Jefferson County residential areas.
- Cane Run Elementary School, Cane Run Road
- Farnsley Middle School, Lees Lane

Control/Background
- University of Louisville Campus, Shelbyville Road

The Ralph Avenue/Camp Ground Road air monitoring site was closest to the DuPont Dow Elastomers facility.

Chloroprene was detected in the ambient air at all five air monitoring locations in excess of the Ambient Air Criteria (see attached table of Benchmark Ambient Air Concentrations).

The text following the Benchmark Ambient Air Criteria table, describes the results of the ambient air monitoring in 2004 and the concentrations at the Ralph Avenue station, Firearms Training Center and Cane Run Elementary School station.

The chloroprene concentration in the air in Rubbertown exceeded the Benchmark Ambient Air Chronic NonCancer Risk level more than 2 miles from the DuPont Dow Elastomer facility.

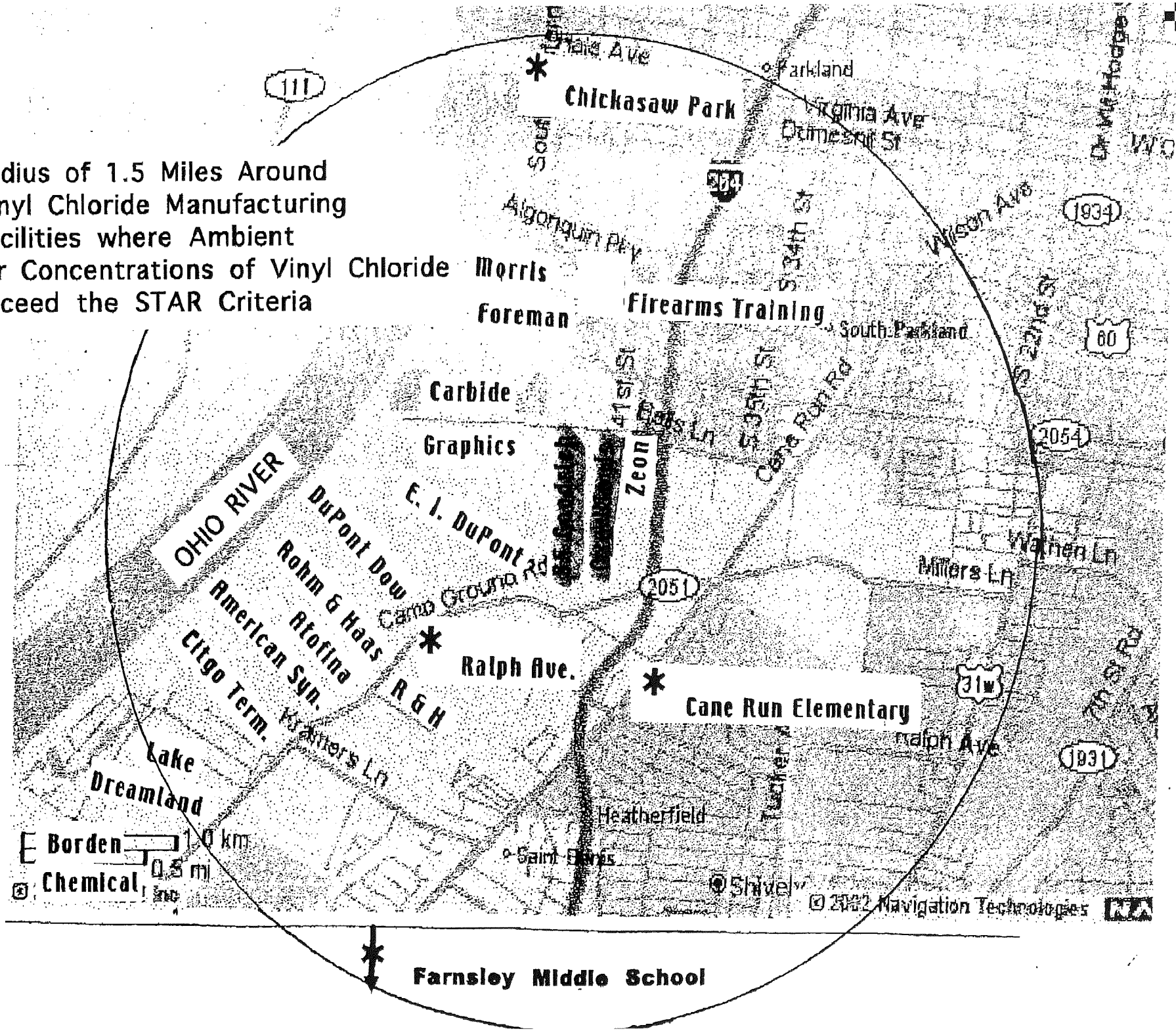
Info on the movement of the Rubbertown DuPont Dow facility to Louisiana is provided in the text.

The worse-case scenario was 357,000 cases of cancer for every million people caused by the Maximum permit limits of Chloroprene according the DuPont Dow Elastomers.

I have extensive data on the DuPont Dow Elastomer facility in Rubbertown and the releases of Chloroprene into the air of the Rubbertown community. The work with the EJ community in Rubbertown was coordinated extensively with EPA Region 4.

Wilma

Radius of 1.5 Miles Around
Vinyl Chloride Manufacturing
Facilities where Ambient
Air Concentrations of Vinyl Chloride
exceed the STAR Criteria



LOUISVILLE BENCHMARK AMBIENT CONCENTRATIONS (PPB)

Chemical	Cancer Risk	Chronic NonCancer Risk
Category 1 Chemicals - Proven to Exceed Health Risk Goals		
1,3-Butadiene	0.0138 ppb	0.92 ppb (24 hr)
1,4-Dichlorobenzene	0.0149 ppb	133 ppb (24 hr)
Acrylonitrile	0.0069 ppb	0.92 ppb (24 hr)
Bromoform	0.087 ppb	4.8 ppb (8 hr)
Benzene	0.04 ppb	9.46 ppb (24 hr)
Carbon Tetrachloride	0.0107 ppb	6.4 ppb (24 hr)
Chloroform	0.0086 ppb	60 ppb (24 hr)
Chloroprene	0.00028 ppb	0.28 ppb (24 hr)
Methyene Chloride	0.59 ppb	112 ppb (24 hr)
Vinyl Chloride	0.092 ppb	40 ppb (24 hr)
Category 1A Chemicals - May Exceed Health Risk Goals		
1,2,4-Trimethylbenzene		246 ppb (8 hr)
Naphthalene	0.057 ppb	0.57 ppb (24 hr)
Toluene		105 ppb (24 hr)
Xylene		24 ppb (24 hr)

Chloroprene is a possible human cancer causing agent and is one of the 18 STAR Program chemicals proven to exceed the health risk goal. Chloroprene is released into the air by DuPont Dow Elastomer. In 2002 the facility released a total of 520,759 pounds of Chloroprene into the air, 46,348 pounds from fugitive sources and 474,411 pounds from stack sources. The Chronic NonCancer Risk Benchmark Ambient concentration for Chloroprene is 0.28 ppb over a 24 hour period. **The Ralph Avenue station exceeded the Benchmark Ambient concentration during 16 of the 28 sampling events in 2004. Exceedences of the Benchmark Ambient concentration occurred during 8 month of the year 2004. The highest Chloroprene value occurred on June 26, 2004 - 15.62 ppb, 56 times the Benchmark Concentration.**

The Firearms Training Center exceeded the Benchmark Ambient concentration 11 of the 28 sampling events in 2004. Exceedences occurred during 8 of the 12 months of 2004. Chloroprene in the air was the highest at the Firearms Training Center station on May 9, 2004 -7.58 ppb, 27 times greater than the Benchmark Ambient concentration.

The Cane Run Elementary School location exceeded the Benchmark Ambient air concentration on 7 of the 28 sampling events. Exceedences occurred during 6 of the 12 months of 2004. Chickasaw Park monitoring station exceeded the Benchmark Ambient concentration during 5 of the 28 sampling events with exceedences occurring during 5 of the 12 months of 2004.

Chloroprene was present in the ambient air of West Louisville in concentrations in excess of the Benchmark Ambient Air Chronic NonCancer Risk concentration more than 1.5 miles from the industrial source facility during 2004.

Dupont Dow Elastomer Facilities in Rubbertown and Louisiana

Total Chloroprene Released in the United States — 913,758 pounds

DDE Louisville, KY

Fugitive air releases	38,737 pounds	
Stack air releases	477,946 pounds	
Total	516,683 pounds	56.5%

DDE LaPlace, LA

Fugitive air releases	4,600 pounds	
Stack air releases	330,000 pounds	
Total	394,600 pounds	43.4%
		99.9%

Chloroprene is one of the 18 STAR Program chemicals that have proven to exceed the health risk goals in the air of Rubbertown.

Chloroprene is detected at the five air monitoring locations of the West Jefferson County Air District on a consistent basis in excess of ambient air standards by as much as 130 times the standard.

Chloroprene is present in the ambient air of Rubbertown in concentrations in excess of the Benchmark Ambient Air Chronic NonCancer Risk level more than 2 miles from the Dupont Dow

Elastomer facility which is the only source of Chloroprene air releases in Rubbertown.

Early 2003, while I was in Louisville to perform workshops for the Rubbertown community and meet with the regulatory agencies, Dupont Dow Elastomer took great pleasure in making an announcement that they were shutting down the Rubbertown facility by 2005 and moving the operations to LaPlace, Louisiana.

Chloroprene is manufactured at the Louisiana facility and transported to the Louisville facility to be polymerized into neoprene.

The organic waste generated at the Louisville facility is transported to Louisiana for treatment in the HI Recovery Unit.

The shutdown of the Louisville facility would eliminate rail shipments of Chloroprene from Louisiana to Louisville and truck shipments of Louisville hazardous waste to the Louisiana facility.

Since that time Rubbertown community members have been interacting with the
-workers at the DDE facility to be shut down
-Labor Union Representatives that represent some of the workers at the DDE facility
-community members in Louisiana that reside in close proximity to the DDE LaPlace facility as the Louisiana facility applies for permits for the major facility expansion to take over production capacity to be shut down in Louisville.

STAR Worst-Case Scenarios for Potential Health Risks

In 2007 Dupont Dow Elastomer (Dupont Performance Elastomers)

facility reported their worst-case scenario as 357,000 cases of cancer for every million people caused by the maximum permit limits for Chloroprene.

The STAR program goal is 1 cancer case in 1 million people for each chemical.

Thus the Chloroprene risk of 357,000 cases per million is 357,000 times the STAR goal.

Art Williams, Director of the Louisville Metro-Air Pollution Control District, stated he was "very concerned" about Dupont's risk estimate.

He further states "That's a huge risk number".

Representatives of Dupont requested that the District give them more leeway, giving the plans to close down the facility."

The initial date for closing down the facility was the end of 2005. Then it was changed until the end of 2006. Now we are nearing the end of 2007 and the facility is still in operation and releasing huge quantities of Chloroprene into the air of the Rubbertown area.

Art Williams has stated that Dupont must comply with the STAR program as long as the facility is in operation.

The community continues to be exposed to the Chloroprene emissions in excess of the STAR Program standard.
